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UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA

DAVID STEBBINS,

PLAINTIFF

VS.

Case 8:24-cv-01486-JVS-KES

JARROD JONES

DEFENDANTS

**SECOND SUPPLEMENTARY BRIEF IN SUPPORT OF**  
**[79] MOTION FOR LIQUIDATED DAMAGES**

Comes now, pro se Plaintiff David Stebbins, who hereby submits the following Supplementary Brief in Support of my Motion for Liquidated Damages in the above-styled action.

**The Defendant's noncooperation has continued and even escalated.**

1. After filing the Motion for Liquidated Damages, I continued to communicate with Jarrod Jones in an attempt to obtain the evidence that I asked for in order to verify his net worth and income. See **Exhibit A**.
2. Despite my numerous, repeated attempts to obtain the evidence from him, he consistently and repeatedly failed to provide anything other than his uncorroborated word (with one minor exception which I'll get to in a minute). As you can see from the attached exhibit, I asked him to show proof that he had sent these requests for evidence to the bank and the IRS. He refused to do so, citing an interest in keeping his sensitive information (such as his social security number) private. See Exhibit A at Page 7.
3. At first glance, this sounds like a reasonable concern. However, even as soon as I read that email, I immediately rolled my eyes and thought to myself "Does this man not know what redaction is?!" If he had simply redacted the parts he wanted to keep private, why not just redact the private parts?! Does he *not realize* that redaction exists?!
4. There was, of course, one piece of evidence that he actually provided to me: His latest pay stub from a company called WIS International. However, when I pointed out how easy it

would be for him to fake that evidence, he immediately replied and said “Let me scan in the whole document and cover up the information that you are not privy to.” See **Exhibit B**.

5. Oh wait! You mean he DOES know what redaction is?! Sure, he didn't say the word “redact” in that email, but the process he described – covering up information he doesn't want me to see – is literally what redaction is.

6. So... why doesn't he do that with his requests for records directed towards the Bank and IRS?!

7. I'll tell you why: It's because *there are no communications!* He's just making it all up and acting like I'm the one who is being unreasonable because he won't show proof of what he's doing!

8. Of course, once he provided me with the WIS International pay stub, I contacted WIS's human resources department and requested that they verify that Jarrod Jones is in fact employed by them. See <https://www.youtube.com/watch?v=7sjNCFnFhkM>. To date, I have not received a response from them. On August 4, 2024, I even wrote the Defendant and told him to tell WIS to reply to my correspondence (see Exhibit A, Page 4), and WIS *still* hasn't replied to my correspondence!

9. In the latest efforts for me to get this information from him, he recently told me that the IRS was giving him the run-around. See Exhibit A, Page 2 (“Well, IRS claims that I am not me”). When I demanded that he show proof that he is actually making a good faith effort to get the information (see Exhibit A, Page 1 - “Of course, you're not gonna show me that you're doing that, are you”), he dropped all pretense that he was doing anything other than giving me the run-around and started giving me complete non-answers, such as “117 emails.. my inbox is almost full,” “Why are you so angry,” and “Can you for once at least act professional?” See Exhibit A, Page 1.

10. At this point, the Defendant isn't even *trying* to provide good faith reasonable cooperation! Even if he wasn't in breach of the Cooperation Clause at the time I filed the motion, he certainly is now.

11. Imagine, if you will, a hypothetical scenario where a trespasser is on someone else's

property, and the property owner (or at least someone who does have permission to be on the property) is telling the trespasser to leave. The trespasser, rather than actually making a beeline for the property line, just stands in one spot for ten solid minutes, all the while saying “I’m leaving! Hold your horses; I’m leaving right now,” but never *actually leaving*. Then, after about ten minutes, the property owner gets fed up with his lack of compliance and starts screaming at him, only for the trespasser to say “Why are you so angry? Can you for once at least act professional?”

12. That’s basically the equivalent of what the Defendant is doing now. Even if he wasn’t in substantial breach of the Cooperation Clause on July 30, when I first filed the motion, he has since been given ample opportunity to show that he is acting with reasonable diligence, and has consistently done nothing but thumb his nose at my efforts to obtain proof.

13. Therefore, I ask the Court to throw the book at the Defendant and award me the liquidated damages.

**For what it’s worth, the liquidated damages will only be applied once.**

14. If the Court is hesitant to grant the motion for liquidated damages, consider this: Once the Court grants it, all investigations will cease. Why? Because I will have already gotten everything I could possibly get out of the investigation, so what’s the point of continuing?

15. Think about it: Imagine if the Court orders the defendant to pay the liquidated damages. I then continue with the investigation, and he still fails to provide reasonable cooperation, or in the alternative, I do in fact, manage to prove that his net worth was in fact greater than what he represented to me during the mediation. What am I going to do that? File a motion for *another* set of Liquidated Damages? And another? And another? Over and over again?

16. At that point, they aren’t liquidated damages at all; they’re *penal* damages, and those are not allowed as a matter of public policy. See <https://brewerlong.com/information/contract-law/liquidated-damages-vs-penalty/>.

17. So if the Court were to grant my Motion for Liquidated Damages, the Defendant would at least have the solace that he no longer needs to cooperate with any of my investigations. He’ll still have to pay the \$11,800 in total damages, and he’ll still have to be my agent and issue

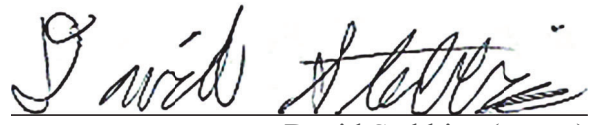
DMCA Takedowns on my behalf to get any instances of the stream removed from any websites, but at least he won't have to provide the evidence that he is clearly not willing to provide.

18. So if it helps the Court in granting this motion, keep that in mind.

**Conclusion**

19. Wherefore, premises considered, I respectfully pray that the Motion for Liquidated Damages be granted.

So requested on this, the 8<sup>th</sup> Day of August, 2024.

  
David Stebbins (pro se)

## EXHIBIT A

## Re: Requests for proof of net worth

---

From: jarrod stangranch.com (jarrod@stangranch.com)

To: acerthorn@yahoo.com

Date: Tuesday, August 6, 2024 at 05:33 PM CDT

---

Can you for once at least act professional?

Do you see this as a video game?

Is causing unneeded ire towards someone your joy in life?

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---

**From:** jarrod stangranch.com <jarrod@stangranch.com>

**Sent:** Tuesday, August 6, 2024 3:30:33 PM

**To:** Acerthorn <acerthorn@yahoo.com>

**Subject:** Re: Requests for proof of net worth

Why are you so angry?

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---

**From:** Acerthorn <acerthorn@yahoo.com>

**Sent:** Tuesday, August 6, 2024 3:20:58 PM

**To:** jarrod stangranch.com <jarrod@stangranch.com>

**Subject:** Re: Requests for proof of net worth

What's that got to do with ANYTHING?!

On Tuesday, August 6, 2024 at 05:11:51 PM CDT, jarrod stangranch.com <jarrod@stangranch.com> wrote:

117 emails.. my inbox is almost full.

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**From:** Acerthorn <acerthorn@yahoo.com>

**Sent:** Tuesday, August 6, 2024 9:36:09 AM

**To:** jarrod stangranch.com <jarrod@stangranch.com>

**Subject:** Re: Requests for proof of net worth

Of course, you're not gonna show me that you're doing that, are you?!

On Monday, August 5, 2024 at 07:07:42 PM CDT, jarrod stangranch.com <jarrod@stangranch.com> wrote:

Send a letter to the IRS to confirm my identity.

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---

**From:** Acerthorn <acerthorn@yahoo.com>

**Sent:** Monday, August 5, 2024 2:57:01 PM  
**To:** jarrod stangranch.com <jarrod@stangranch.com>  
**Subject:** Re: Requests for proof of net worth

So what are you gonna do about this?

On Monday, August 5, 2024 at 04:31:53 PM CDT, jarrod stangranch.com <jarrod@stangranch.com> wrote:

Well, IRS claims that I am not me.

Very sorry is taking so long.

---

**From:** Acerthorn <acerthorn@yahoo.com>  
**Sent:** Monday, August 5, 2024 1:39 PM  
**To:** jarrod stangranch.com <jarrod@stangranch.com>  
**Subject:** Re: Requests for proof of net worth

What I include in my second batch will depend on what you've produced in response to the first batch, so I don't have the second batch yet.

And before you say anything, no, you do not have six whole months to respond to the first waive of requests. That's a ludicrous concept, and the Pro Se Clinic can vouch for me on that. They'll tell you that, in all likelihood, (A) the magistrate judge set the 6 month time limit because that's the usual amount of time to conduct discovery in most civil cases, and (B) discovery in civil cases involve multiple rounds of discovery requests. It's only after 6 months that all discovery must be completed by that time, not the length of time for the respondent to reply to the first batch.

On Monday, August 5, 2024 at 03:33:06 PM CDT, jarrod stangranch.com <jarrod@stangranch.com> wrote:

I notice that the email you sent says "first batch".

I am very autistic could I get the whole list of stuff you want?

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**From:** jarrod stangranch.com <jarrod@stangranch.com>  
**Sent:** Monday, August 5, 2024 1:28:38 PM  
**To:** Acerthorn <acerthorn@yahoo.com>  
**Subject:** Re: Requests for proof of net worth

So hostile.

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**From:** Acerthorn <acerthorn@yahoo.com>  
**Sent:** Monday, August 5, 2024 12:39:28 PM  
**To:** jarrod stangranch.com <jarrod@stangranch.com>  
**Subject:** Re: Requests for proof of net worth

It's not Sunday anymore

On Sunday, August 4, 2024 at 10:29:43 PM CDT, jarrod stangranch.com <jarrod@stangranch.com> wrote:

Has it occurred to you that the corporate offices of WIS are closed because it's Sunday?

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**From:** jarrod stangranch.com <jarrod@stangranch.com>  
**Sent:** Sunday, August 4, 2024 12:19:45 PM  
**To:** Acerthorn <acerthorn@yahoo.com>  
**Subject:** Re: Requests for proof of net worth

I fear that whatever I send you as proof.

You will cry to be it's photoshop and lies.

I'll continue to do my best.

It's the weekend and most institutions are closed.

---

**From:** Acerthorn <acerthorn@yahoo.com>  
**Sent:** Sunday, August 4, 2024 12:18 PM  
**To:** jarrod stangranch.com <jarrod@stangranch.com>  
**Subject:** Re: Requests for proof of net worth

You've proven yourself worthy of neither. As I've said, you've done nothing but bad faith and lies for the past two years, and you've only even made nominal attempts to explain about a third of the stuff I've already brought to your attention.

Now either show me proof that you're actually trying to get the stuff I asked for or I'm bringing your lack of proof up to the judge when we do our oral argument.

On Sunday, August 4, 2024 at 02:09:48 PM CDT, jarrod stangranch.com <jarrod@stangranch.com> wrote:

Good faith and trust.

I think you have neither.

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**From:** Acerthorn <acerthorn@yahoo.com>  
**Sent:** Sunday, August 4, 2024 12:07:45 PM  
**To:** jarrod stangranch.com <jarrod@stangranch.com>  
**Subject:** Re: Requests for proof of net worth

And why should I believe that when you haven't shown me any proof that you're trying to get it?!

On Sunday, August 4, 2024 at 02:05:57 PM CDT, jarrod stangranch.com <jarrod@stangranch.com> wrote:

Still working on it.

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---

**From:** Acerthorn <acerthorn@yahoo.com>  
**Sent:** Sunday, August 4, 2024 7:59:15 AM  
**To:** jarrod stangranch.com <jarrod@stangranch.com>  
**Subject:** Re: Requests for proof of net worth

Then where's the evidence I requested?!



On Sunday, August 4, 2024 at 09:43:57 AM CDT, jarrod stangranch.com <jarrod@stangranch.com> wrote:

I am going to cooperate.

Stop putting words in my mouth.

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Again, read my Reply Brief that I filed with the Court. Specifically, go back and read ¶¶ 16-21.

On Sunday, August 4, 2024 at 09:36:30 AM CDT, jarrod stangranch.com <jarrod@stangranch.com> wrote:

Settlement agreement is also 6 months.

Not weeks.

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**Sent:** Sunday, August 4, 2024 7:05:10 AM  
**To:** jarrod stangranch.com <jarrod@stangranch.com>  
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On Friday, August 2, 2024 at 08:07:31 AM CDT, jarrod stangranch.com <jarrod@stangranch.com> wrote:

My zellzander@gmail.com account was tied to a YouTube brand I was trying out, but ended up not liking it.

Only way to delete the brand was to delete the account.

Had nothing to do with you. I actually completely forgot you existed around that time.

I said their writing styles are similar, not different.

I'm done with this squabbling for now. You're not getting anywhere.

I am not cherry picking, I am summarizing.

Outside of uploading the video to KiwiFarms, and blending in with the community to not bring ill will towards myself.

What I've said has always retained to your lack of cleanliness, and my opinion on your court filings.

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---

**From:** Acerthorn <acerthorn@yahoo.com>

**Sent:** Friday, August 2, 2024 6:01 AM

**To:** jarrod stangranch.com <jarrod@stangranch.com>

**Subject:** Re: Requests for proof of net worth

There's at least one ill activity towards me you undeniably did, and that was reposted my paywalled stream.

Don't fucking gaslight me. I can still see your post history on Kiwi Farms. I can still see all the posts you made in my thread.

And also you still haven't justified half the stuff I've confronted you with, like demanding trial by combat, giving me the run-around for the better part of two years while I tried to serve you with process, presumably deleting your zellzander@gmail.com account so I couldn't serve you with process, and then acting like you reposting my stream was in fact all my fault simply because I'm a big stinky doo-doo head.

You cherry pick the things you think you can justify while ignoring all the others.

Also, how the fuck are their writing styles different? And how the fuck does that make them related?

On Friday, August 2, 2024 at 07:43:00 AM CDT, jarrod stangranch.com <jarrod@stangranch.com> wrote:

I have never participated in harassment or doxxing towards you.

I have suspicions of my own about many people that are not that difficult to piece together. I theorize that TGP is related to IK because their typing style looks similar.

I do not do any ill activity towards you if you think otherwise that is something you've made up in your head and you continue to be very impolite in these emails.

If you still insist to make me the enemy here, you're doing yourself no favors.

Your stance towards me is fabricated based on false information and lies.

---

**From:** Acerthorn <acerthorn@yahoo.com>

**Sent:** Friday, August 2, 2024 5:38 AM

**To:** jarrod stangranch.com <jarrod@stangranch.com>

**Subject:** Re: Requests for proof of net worth

Now, see? You just exposed yourself.

How could you possibly know what "many people" think is their "running theory" if you weren't actively participating in the harassment and doxxing yourself?

Same with how you suspect that IK is actually a close friend of TGP482. If you weren't actively participating in those discussions, how could you possibly know that? Even if you don't remember exactly what was said that lead you to believe that, you still have memories of engaging in conversations about me where that was revealed.

And yet, you insist that you never participated in harassing or cyberstalking me. But if you weren't, how could you possibly know these things?

On Friday, August 2, 2024 at 05:29:35 AM CDT, jarrod stangranch.com <jarrod@stangranch.com> wrote:

You have more than likely contracted pneumonia due to your living conditions and not because of harassment that is the running theory between many people.

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You have more than likely contracted pneumonia due to your living conditions and not because of harassment that is the running theory between many people.

I am not lying, but you're continuing to try to gaslight me into thinking I'm lying.

---

**From:** Acerthorn <acerthorn@yahoo.com>  
**Sent:** Friday, August 2, 2024 3:26 AM  
**To:** jarrod stangranch.com <jarrodd@stangranch.com>  
**Subject:** Re: Requests for proof of net worth

**"I have no further comments on the thread"**

Oh yes you do! All you're doing is making more lies! I've seen private emails between you and me end up on Kiwi Farms because you keep having your friends post them. Like, for example, that time you signed off by calling yourself my "biggest fan." Someone posted that on Kiwi Farms, despite the fact that the only way they could possibly get that information is if you told them.

So no, you are CONTINUING to lie to my face!

And yes, severe trauma. As in ... I was literally hospitalized for eight whole days and **could have died** because of all the harassment I suffered at the hands of you and your fellow trolls!

On Friday, August 2, 2024 at 05:20:45 AM CDT, jarrod stangranch.com <jarrodd@stangranch.com> wrote:

The entire site isn't a toxic cesspool of bullying and harassment, see this thread. <https://kiwifarms.st/threads/tabletop-roleplaying-games-d-d-pathfinder-coc-etc.737/>

At the behest of my personal safety, I have no further comments on the thread. That person should have used cleaner language to warn you, and not threaten you. In fact, that typing looks like it matches someone related to InitiativeKookie.

Severe trauma?

---

**From:** Acerthorn <acerthorn@yahoo.com>  
**Sent:** Friday, August 2, 2024 3:16 AM  
**To:** jarrod stangranch.com <jarrodd@stangranch.com>  
**Subject:** Re: Requests for proof of net worth

You really think Kiwi Farms would have been dropped by literally every major hosting service in the entire developed world, and been forced to obtain hosting by some obscure company in the equally obscure island country of Sao Tome & Principe, because literally nobody in the developed world wants anything to do with them, if the entire site WASN'T a toxic cesspool of harassment and cyberbullying?

Also, I'm not even talking about the two sentences of text. I'm talking about the way you blatantly reposted my paywalled video so that everyone else could see it without paying me for it.

You know how I even *found out* about that? Prior to you reposting it, I didn't even follow my own thread on Kiwi Farms. I only started following it *because* of your reposting of my video!

Here's a screenshot of someone telling me that you had done it: <https://i.postimg.cc/qv0Sp8fd/22-06-29-Exciting-Ad-9925-Reddit-DM-1.png>

It was at that point that I had no choice but to check out my own Kiwi Farms thread, if for no other reason than to enforce my own IP rights!

So in a way, even if you didn't personally engage in some of the most heinous acts in that thread, you indirectly caused me to become privy to it all and therefore suffer the severe trauma that entails.



On Friday, August 2, 2024 at 05:08:10 AM CDT, jarrod stangranch.com <jarrod@stangranch.com> wrote:

But in the video you did have a cut on your face, and your room didn't look clean in the video.

I'm not gaslighting, nor am I contributing to harassment and bullying if I was pointing out the obvious truth.

---

**From:** Acerthorn <acerthorn@yahoo.com>  
**Sent:** Friday, August 2, 2024 3:06 AM  
**To:** jarrod stangranch.com <jarrod@stangranch.com>  
**Subject:** Re: Requests for proof of net worth

Then what the hell do you call the very post that I sued you for in the first place? Don't fucking gaslight me. You were very clearly contributing to the harassment and cyberbullying.

On Friday, August 2, 2024 at 05:02:40 AM CDT, jarrod stangranch.com <jarrod@stangranch.com> wrote:

I've not participated in any bullying, I do not condone the behavior.

I don't think you deserve to be bullied, harassed or doxxed. Everyone deserves their own slice of privacy online, and the comfort and safety that it provides.

You've been putting words in my mouth so to speak, or misinterpreting what I say.

You can continue to paint this one-sided picture of me since clearly it looks like you enjoy it. It's all just words, and I am mature enough to not be bothered by such.

I'm not the one typing words in all caps here.

I haven't lied, and I do not think sharing with you a screenshot of my personal information that I've sent to the IRS because you don't have any right to my Social Security Number. All documents that prove that I'm waiting to be verified contain personal information that I do not want out there, and you not deserving of such information. That is between myself and government entities.

You just need to be patient.

---

**From:** Acerthorn <acerthorn@yahoo.com>  
**Sent:** Friday, August 2, 2024 2:56 AM  
**To:** jarrod stangranch.com <jarrod@stangranch.com>  
**Subject:** Re: Requests for proof of net worth

And see? That... that right there ... is PRECISELY what proves my point!

You are completely incapable of taking any sort of accountability! You just ADMITTED that I have been harassed, doxxed, and bullied, and you just ADMITTED that Kiwi Farms played a significant role in facilitating that harassment, and that you (Jarrod Jones in particular) personally contributed to it!

And yet, you still feel you are entirely justified (not just legally, but morally as well) in participating in all this bullying. Why? Because I'm a big, stinky doo-doo head who deserves the harassment I got. It doesn't matter that I violated nobody's legal rights. It doesn't matter that I mind my own business *until* someone harasses me. None of that matters. I *deserve* the pain I've received - based solely on your personal, arbitrary standards of

what counts as "deserving" it - and therefore you are entirely morally justified in inflicting it upon me.

This just proves that you are rotten to the core. You have done nothing but tell bald faced lies ever since you appeared in the case (after nearly two years of giving me the run-around), and even still, even after I demand proof that you actually requested these documents from the bank and IRS, you still haven't provided me with any actual proof that you've done so. You expect me to trust you when you haven't done a damn thing to actually earn my trust!

And you say I am unjustified in being fed up with you simply because all the shitty things you've done were, in your own personal view, themselves justified?! Go to hell!

On Friday, August 2, 2024 at 04:07:12 AM CDT, jarrod stangranch.com <jarrod@stangranch.com> wrote:

I am familiar with those concepts because I too have been previously doxxed, harassed, and bullied by assholes online.

My reactions haven't been heinous enough to sue people over hurt feelings, nor ridiculous enough to have a thread on KiwiFarms.

---

**From:** Acerthorn <acerthorn@yahoo.com>  
**Sent:** Friday, August 2, 2024 2:04 AM  
**To:** jarrod stangranch.com <jarrod@stangranch.com>  
**Subject:** Re: Requests for proof of net worth

Are YOU familiar with the concept of cyberbullying, doxxing, and cyber harassment? Because that's literally what Kiwi Farms does!

On Friday, August 2, 2024 at 04:02:52 AM CDT, jarrod stangranch.com <jarrod@stangranch.com> wrote:

The KKK?

Never, all of them can rot. They're not good people, and I don't support them.

Are you not familiar with the concept of shitposting?

---

**From:** Acerthorn <acerthorn@yahoo.com>  
**Sent:** Friday, August 2, 2024 2:01 AM  
**To:** jarrod stangranch.com <jarrod@stangranch.com>  
**Subject:** Re: Requests for proof of net worth

You hold yourself as an honest person, yet you post on the Kiwi Farms!

What's next? Calling yourself a good person while attending fucking KKK meetings?!

You call yourself an "honest person," yet you demand trial by combat!

Fuck me, you really have your head so far up your own ass that you honest-to-goodness don't notice the stench!

On Friday, August 2, 2024 at 03:57:14 AM CDT, jarrod stangranch.com <jarrod@stangranch.com> wrote:

I have read your reply.

You've put words in my mouth, and have done nothing but lie to make you sound like the better

party.

I haven't lied a bit in the last two years.

I hold myself as a honest person trying to survive this game called life.

---

**From:** Acerthorn <acerthorn@yahoo.com>  
**Sent:** Friday, August 2, 2024 1:55 AM  
**To:** jarrod stangranch.com <jarrodd@stangranch.com>  
**Subject:** Re: Requests for proof of net worth

**"I haven't lied to you at any point so far."**

OH YES YOU FUCKING HAVE!

Haven't you read my Reply so far? You've literally done nothing BUT lie to me for the past two years!

On Friday, August 2, 2024 at 03:46:34 AM CDT, jarrod stangranch.com <jarrodd@stangranch.com> wrote:

You have to be patient and place trust.

I haven't lied to you at any point so far.

I don't know where you're coming up with that information.

Patience is a virtue.

---

**From:** Acerthorn <acerthorn@yahoo.com>  
**Sent:** Friday, August 2, 2024 1:45 AM  
**To:** jarrod stangranch.com <jarrodd@stangranch.com>  
**Subject:** Re: Requests for proof of net worth

Oh, that's convenient!

How do I know you even did that at all? And that you're not just lying to me?!

On Friday, August 2, 2024 at 02:59:46 AM CDT, jarrod stangranch.com <jarrodd@stangranch.com> wrote:

I have not been given a time frame by either.

---

**From:** Acerthorn <acerthorn@yahoo.com>  
**Sent:** Friday, August 2, 2024 12:01 AM  
**To:** jarrod stangranch.com <jarrodd@stangranch.com>  
**Subject:** Re: Requests for proof of net worth

How long will that take?

On Thursday, August 1, 2024 at 05:13:44 PM CDT, jarrod stangranch.com <jarrodd@stangranch.com> wrote:

You do understand that obtaining the documents take time, right?

SSI is simple because it's a login, but for historical bank statements I have to prove my identity to my bank since my current information is not on record with my bank account. Same with the IRS system. I am waiting to be verified by both institutions before I am able to get any documents. I am awaiting the documentation from both the IRS and the Bank to satisfy your request.

This will take more time than I expected.

---

**From:** Acerthorn <acerthorn@yahoo.com>  
**Sent:** Thursday, August 1, 2024 11:07 AM  
**To:** jarrod stangranch.com <jarrodd@stangranch.com>  
**Subject:** Re: Requests for proof of net worth

So ... by now, surely, you've read my Reply to your Response Brief. So tell me: Are you actually going to comply and get me the documents I asked for, in a way that cannot be faked or photoshopped? Are you, at the very least, going to give me regular updates on your efforts to obtain them? Or are you just going to continue to ghost me and say that it's "taking longer than expected" and expect me to just give you every conceivable benefit of the doubt even though you haven't earned one iota of my respect?

You're still under a contractual obligation to cooperate. The only way you'd be out of that obligation is if the judge grants the liquidated damages, which is an outcome you definitely want to avoid. But until then, your continued refusal to provide reasonable cooperation is only adding fuel to the fire and giving me even more grounds to say you're in breach.

On Wednesday, July 31, 2024 at 03:55:16 AM CDT, jarrod stangranch.com <jarrodd@stangranch.com> wrote:

You're an attorney now too? Let me see your Bar Association credentials.

---

**From:** jarrod stangranch.com <jarrodd@stangranch.com>  
**Sent:** Wednesday, July 31, 2024 1:54 AM  
**To:** Acerthorn <acerthorn@yahoo.com>  
**Subject:** Re: Requests for proof of net worth

First you cite Jim Sterling, LegalEagle, and then yourself?

Are you able to cite anything that is relevant?

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**From:** Acerthorn <acerthorn@yahoo.com>  
**Sent:** Wednesday, July 31, 2024 1:53 AM  
**To:** jarrod stangranch.com <jarrodd@stangranch.com>  
**Subject:** Re: Requests for proof of net worth

<https://youtube.com/clip/UgkxActZsJliSMv1jKvktoE05-SgorGShAvT>

On Wednesday, July 31, 2024 at 03:39:17 AM CDT, jarrod stangranch.com <jarrodd@stangranch.com> wrote:

You're probably typing that reply brief right now too.

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**From:** Acerthorn <acerthorn@yahoo.com>

**Sent:** Wednesday, July 31, 2024 1:38 AM  
**To:** jarrod stangranch.com <jarrod@stangranch.com>  
**Subject:** Re: Requests for proof of net worth

Then try it. Raise it in your response brief, and I'll object to that in my reply brief.

On Wednesday, July 31, 2024 at 03:36:12 AM CDT, jarrod stangranch.com <jarrod@stangranch.com> wrote:

I have standing to contest that the nature of your usage of information from Spokeo is a breach of service agreement between you and Spokeo.

I understand plenty.

---

**From:** Acerthorn <acerthorn@yahoo.com>  
**Sent:** Wednesday, July 31, 2024 1:28 AM  
**To:** jarrod stangranch.com <jarrod@stangranch.com>  
**Subject:** Re: Requests for proof of net worth

Here's the thing; You can make the stretchy argument that just about anything qualifies as X if you bend over backwards enough. Just because my use thereof is at least partially related to money doesn't mean I'm using it for a financial purpose. The fact that it listed your income at all means that I have the right to use that evidence for such purposes that are related to it. If they didn't want me using it for anything even tangentially related to finance, they shouldn't have included your financials in the report in the first place.

But here's something you don't seem to understand: You don't have standing to contest that. The EULA that I agreed to when I bought that 1 month of Spokeo is solely between them and me. You are not "in privity" regarding that EULA. Famous lawyer turned YouTuber Devin "LegalEagle" Stone gives a brief explanation of how privity works in this clip: [NFTs Are Legally Problematic ft. Steve Mould & Coffeezilla](#) (timestamp 6:52 - 8:39).



**NFTs Are Legally Problematic ft. Steve Mould & Coffeezilla**

So even if I technically violated Spokeo's EULA, it doesn't matter, not unless Spokeo themselves want to file a motion to intervene in this case. Even if they tried to sue me themselves in their own, separate lawsuit, it still wouldn't affect anything in this case.

On Wednesday, July 31, 2024 at 03:11:57 AM CDT, jarrod stangranch.com <jarrod@stangranch.com> wrote:

But during the settlement hearing, supposedly, you were trying to get as much money out of me as possible because Spokeo says I have this imaginary 150k to 175k.

I say that's for financial benefit to you.

---

**From:** Acerthorn <acerthorn@yahoo.com>  
**Sent:** Wednesday, July 31, 2024 1:10 AM  
**To:** jarrod stangranch.com <jarro@stangranch.com>  
**Subject:** Re: Requests for proof of net worth

"did you know that when you paid for the service you agreed to not use the information for financial reasons?"

I'm not. I'm using it for *investigatory* purposes.

On Wednesday, July 31, 2024 at 03:03:08 AM CDT, jarrod stangranch.com <jarro@stangranch.com> wrote:

You don't need my entire employment history to determine my current net worth. No Judge would suggest that.

You don't need me to expose the privacy of random strangers to prove that Spokeo is incorrect, in fact, did you know that when you paid for the service you agreed to not use the information for financial reasons?

There will be more in the response to your unreasonable demand based on false information later today.

---

**From:** Acerthorn <acerthorn@yahoo.com>  
**Sent:** Tuesday, July 30, 2024 10:50 PM  
**To:** jarrod stangranch.com <jarro@stangranch.com>  
**Subject:** Re: Requests for proof of net worth

How are these "irrelevant" demands?

On Tuesday, July 30, 2024 at 03:00:06 PM CDT, jarrod stangranch.com <jarro@stangranch.com> wrote:

Really?

I get a job so I can pay you the \$100/mo, you ask for insane, irrelevant demands, and I miss a deadline and my

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**From:** jarrod stangranch.com <jarro@stangranch.com>  
**Sent:** Monday, July 29, 2024 7:22:37 AM  
**To:** Acerthorn <acerthorn@yahoo.com>  
**Subject:** Re: Requests for proof of net worth

I'm still at work.

I do not know my end time.

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**From:** Acerthorn <acerthorn@yahoo.com>

**Sent:** Monday, July 29, 2024 7:21:22 AM  
**To:** jarrod stangranch.com <jarro@stangranch.com>  
**Subject:** Re: Requests for proof of net worth

It's Monday

On Thursday, July 25, 2024 at 02:53:31 PM CDT, jarrod stangranch.com <jarro@stangranch.com> wrote:

Give me until Monday for rest of financials. The other Jarrod Jones is going to take a bit. Have to find a reliable source of data.

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**From:** Acerthorn <acerthorn@yahoo.com>  
**Sent:** Thursday, July 25, 2024 12:49:49 PM  
**To:** jarrod stangranch.com <jarro@stangranch.com>  
**Subject:** Re: Requests for proof of net worth

How soon will you be able to get me the rest of the stuff I asked for?

On Thursday, July 25, 2024 at 02:36:36 PM CDT, jarrod stangranch.com <jarro@stangranch.com> wrote:

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**From:** Acerthorn <acerthorn@yahoo.com>  
**Sent:** Thursday, July 25, 2024 12:35 PM  
**To:** jarrod stangranch.com <jarro@stangranch.com>  
**Subject:** Re: Requests for proof of net worth

Anything that references you specifically?

On Thursday, July 25, 2024 at 02:33:31 PM CDT, jarrod stangranch.com <jarro@stangranch.com> wrote:

Here

---

**From:** Acerthorn <acerthorn@yahoo.com>  
**Sent:** Thursday, July 25, 2024 12:31 PM  
**To:** jarrod stangranch.com <jarro@stangranch.com>  
**Subject:** Re: Requests for proof of net worth

Something from the government directly

On Thursday, July 25, 2024 at 02:30:03 PM CDT, jarrod stangranch.com <jarro@stangranch.com> wrote:

What would be a verified format?

---

**From:** Acerthorn <acerthorn@yahoo.com>  
**Sent:** Thursday, July 25, 2024 12:29 PM  
**To:** jarrod stangranch.com <jarro@stangranch.com>  
**Subject:** Re: Requests for proof of net worth

Can you provide this in a verified format?

On Thursday, July 25, 2024 at 02:19:38 PM CDT, jarrod stangranch.com <jarrod@stangranch.com> wrote:

I will get on it.

For now, here is my last 12 years of taxable income as reported by SSI.

---

**From:** Acerthorn <acerthorn@yahoo.com>

**Sent:** Thursday, July 25, 2024 11:58 AM

**To:** jarrod stangranch.com <jarrod@stangranch.com>

**Subject:** Requests for proof of net worth

Jarrood,

Here is my first batch of requests for you to prove your net worth:

- Past five years tax returns
- Past two years bank statements
- You said there was a guy in Everette WA with a similar name to you. Please tell me his full name, address, email address, and phone number for that man, so I can verify him.
- Every place you have worked for the past ten years, the dates of those employments, and the incomes earned



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## EXHIBIT B

## Re: Requests for proof of net worth

From: jarrod stangranch.com (jarrod@stangranch.com)

To: acerthorn@yahoo.com

Date: Friday, August 2, 2024 at 06:28 AM CDT

Let me scan in the whole document and cover up the information that you are not privy to.

---

**From:** Acerthorn <acerthorn@yahoo.com>  
**Sent:** Friday, August 2, 2024 4:25 AM  
**To:** jarrod stangranch.com <jarrod@stangranch.com>  
**Subject:** Re: Requests for proof of net worth

And this just proves my point! You don't even show the whole damn thing, so you could very easily have faked it. It could easily have belonged to someone else entirely.

Second, that isn't a pay stub. I've gotten pay stubs before. I've *sent* pay stubs to the Social Security Office because, as an SSI recipient, I have to report any earned income i receive. So I know what they look like.

Third, even if we assume that's YOUR pay stub, that only counts as the wages from employment for ONE job, not any of your side hustles or investments!

And fourth, what little of that pay stub I can see says that it goes to the "head of household." I thought you were staying with a friend? So ... that must be HIS pay stub, right?

On Friday, August 2, 2024 at 06:19:41 AM CDT, jarrod stangranch.com <jarrod@stangranch.com> wrote:

Okay, attached is a photo taken from my latest paystub. These are deductions from my paycheck, taxes if you will.

The first row is for Social Security, it's what pays for any SSI that I am eligible to receive later in life after I retire which with current income and gathered Social Security credits comes out to age 72. On my pay stub I've paid what comes out to \$14.20, with a Year to Date paid of \$14.20.

The second row is for Medicaid and it comes out to \$3.32, and a Year to Date paid of \$3.22.

The third row is California State Tax.

The above two are standard itemizations for deductions on any paystub that any working person receives. Everyone pays the Social Security Administration a tax that pays into SSI benefits if they need it, or as a monthly payment once retirement age is reached.

I am not getting SSI benefits, and I don't qualify for SSI benefits because I do not have any severe disability that limits my ability to work.

I hope this clears things up for you.

---

**From:** jarrod stangranch.com <jarrod@stangranch.com>  
**Sent:** Friday, August 2, 2024 4:09 AM